

JOEL A. ACKERMAN
JA 4027

XCA-156668-1/cwai
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor
Wells Fargo Bank, N.A., successor by merger to Wachovia Bank, N.A.
200 Sheffield Street, Suite 101
P.O. Box 1024
Mountainside, NJ 07092-0024
1-908-233-8500

IN RE:

Lazaro Bacallao aka Lazaro D Bacallao

Debtor

: UNITED STATES BANKRUPTCY COURT
: FOR THE DISTRICT OF NEW JERSEY
:
: CHAPTER 7
:
: CASE NO. 11-32586-NLW
:
: **NOTICE OF MOTION TO VACATE**
: **AUTOMATIC STAY**
: **(RET: September 19, 2011 @ 9:00am)**
: **ORAL ARGUMENT WAIVED**

Lazaro Bacallao aka Lazaro D Bacallao
322 6th Street
Union City, NJ 07087

Anthony F Sarsano, Esq.
Attorney for Debtor(s)
4500 Cottage Place
Union City, NJ 07087

Charles Forman, Trustee
Forman, Holt Eliades & Ravin LLC
80 Route 4 East
Paramus, NJ 07652

SIRS:

PLEASE TAKE NOTICE that on September 19, 2011 @ 9:00am, or soon as counsel may be heard, the undersigned, attorneys for Wells Fargo Bank, N.A. as servicer for Wells Fargo Bank, N.A., successor by merger to Wachovia Bank, N.A., the Secured Creditor, will move before the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, P.O. Box 1352, Newark, NJ 07101-1352 for an Order Vacating the Automatic Stay, with respect to the debtor's property at 322 6th Street, Union City, NJ 07087, and allowing Wells Fargo Bank, N.A. as servicer for Wells Fargo Bank, N.A., successor by merger to Wachovia Bank, N.A., the Secured Creditor, to continue its foreclosure action, by reason of the Secured Creditor's interest in the premises located at 322 6th Street, Union City, NJ 07087 being inadequately protected in violation of 11 USC 362(d).

TAKE FURTHER NOTICE that the facts Wells Fargo Bank, N.A. as servicer for Wells Fargo Bank, N.A., successor by merger to Wachovia Bank, N.A. relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and

TAKE FURTHER NOTICE that oral argument is hereby not requested.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor
Wells Fargo Bank, N.A., successor by merger to
Wachovia Bank, N.A.

/s/ JOEL A. ACKERMAN
JOEL A. ACKERMAN
MEMBER OF THE FIRM

DATED: August 26, 2011

This is an attempt to collect a debt. Any information obtained will be used for that purpose.